

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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BEAVER COUNTY EMPLOYEES'	:	Civ. No. 0:14-cv-00786-ADM-TNL
RETIREMENT FUND; ERIE COUNTY	:	
EMPLOYEES' RETIREMENT SYSTEM;	:	<u>CLASS ACTION</u>
and LUC DE WULF, Individually and on	:	
Behalf of All Others Similarly Situated,	:	
	:	Hearing Date: December 10, 2015
Plaintiffs,	:	Time: 10:00 a.m.
vs.	:	Courtroom: 3B
	:	
TILE SHOP HOLDINGS, INC., ROBERT	:	
A. RUCKER, THE TILE SHOP, INC.,	:	
TIMOTHY C. CLAYTON, PETER J.	:	
JACULLO III, JWTS, INC., PETER H.	:	
KAMIN, TODD KRASNOW, ADAM L.	:	
SUTTIN AND WILLIAM E WATTS;	:	
ROBERT W. BAIRD & CO.	:	
INCORPORATED; CITIGROUP	:	
GLOBAL MARKETS INC.; CJS	:	
SECURITIES, INC., HOULIHAN LOKEY	:	
CAPITAL, INC.; PIPER JAFFRAY &	:	
CO.; SIDOTI & COMPANY, LLC;	:	
TELSEY ADVISORY GROUP LLC; and	:	
WEDBUSH SECURITIES, INC.,	:	
	:	
Defendants.	:	
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LEAD PLAINTIFFS MOTION TO COMPEL
THE PRODUCTION OF DOCUMENTS
BY THE TILE SHOP DEFENDANTS

Beaver County Employees' Retirement Fund, Erie County Employees Retirement System, and Luc Dewulf (collectively, "Plaintiffs") respectfully move this Court for an Order compelling defendants Tile Shop Holdings, Inc. ("Tile Shop"), Robert A. Rucker ("Rucker"), The Tile Shop, Inc., and Timothy C. Clayton to produce all non-privileged documents from the files of Rucker, Fumitake Nishi, LiXun Rucker, Adam Rucker, Fan Wang, Joseph Kinder, Carl Randazzo, Hasim Khorakiwala and Jim Beukelman, as well as Tile Shop's corporate files, from January 1, 2008 to March 31, 2014, that: (i) concern the formation, ownership, control or operation of Beijing Pingxiu; or (ii) mention Jian Zhang or Pan Zhang, together with such other relief as the Court deems just and proper.

Plaintiffs respectfully request that the Court grant this Motion for the reasons set forth in the accompanying Memorandum of Law and Declaration of William J. Geddish, dated November 13, 2015, to which all exhibits are attached.

DATED: November 13, 2015

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